

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

DANNY JAY DELONG;
WINONA ROSE PLANT,
a/k/a WINONA ROSE MARTELL; and
TAYLOR JADE DAVIS

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 3, 113(a)(3),
924(c)(1)(A)(iii), 1153, 1512(a)(2)(A),
1512(c), and 2

COUNT ONE

Assault with a Dangerous Weapon

The Grand Jury Charges:

On or about April 16, 2023, in the District of North Dakota, in Indian country, and
within the exclusive jurisdiction of the United States,

DANNY JAY DELONG,

an Indian, assaulted W.M. with a dangerous weapon, namely, a firearm, with intent to do
bodily harm to W.M.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1153.

COUNT TWO

Discharge of a Firearm in Relation to a Crime of Violence

The Grand Jury Further Charges:

On or about April 16, 2023, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

DANNY JAY DELONG

knowingly used, carried, and discharged a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Assault with a Dangerous Weapon, as set forth in Count One above;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT THREE

Tampering with a Witness, Victim, or Informant by Physical Force or Threat

The Grand Jury Further Charges:

On or about April 16, 2023, in the District of North Dakota, and elsewhere,

DANNY JAY DELONG

individually, and by aiding and abetting, knowingly did and attempted to use the threat of physical force against W.R.P. and T.J.D. with intent to influence, delay, or prevent the testimony of W.R.P. and T.J.D., in an official proceeding;

In violation of Title 18, United States Code, Sections 1512(a)(2)(A) and 2.

COUNT FOUR

Tampering

The Grand Jury Further Charges:

On or about April 16, 2023, in the District of North Dakota,

DANNY JAY DELONG;
WINONA ROSE PLANT, a/k/a WINONA ROSE MARTELL; and
TAYLOR JADE DAVIS,

individually, and by aiding and abetting, corruptly concealed an object, namely, a firearm, with intent to impair the object's integrity and availability for use in an official proceeding, namely, the federal grand jury investigation and federal prosecution of this matter, including the trial regarding the charges as set forth in Counts One and Two above;

In violation of Title 18, United States Code, Sections 1512(c) and 2.

COUNT FIVE

Accessory After the Fact

The Grand Jury Further Charges:

On or about April 16, 2023, in the District of North Dakota,

WINONA ROSE PLANT, a/k/a WINONA ROSE MARTELL; and
TAYLOR JADE DAVIS,

knowing that an offense against the United States had been committed, namely, Assault with a Dangerous Weapon, as set forth in Count One, and Discharge of a Firearm in Relation to a Crime of Violence, as set forth in Count Two, received, relieved, comforted, and assisted the offender, namely, DANNY JAY DELONG, in order to hinder and prevent DANNY JAY DELONG's apprehension, trial, and punishment;

In violation of Title 18, United States Code, Sections 3 and 2.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

ST/tah